

Hon. Kymberly K. Evanson

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION, et al.,

Defendants.

CASE NO. C25-1228-KKE

**STIPULATED MOTION TO AMEND
INITIAL DISCLOSURES AND OTHER
CASE DEADLINES AND ORDER**

JOINT STIPULATION

Pursuant to the Court's Order of August 1, 2025 (Dkt. 145), the parties currently have three deadlines in the month of October set to (1) conduct a Rule 26(f) conference, (2) exchange initial disclosures, and (3) file a combined joint status report and discovery plan. As previously explained to the Court, defense counsel is currently out of the office and will return on Monday, October 6, 2025. Oral argument on Plaintiffs' Motion for Preliminary Injunction and Defendants' Motion to Dismiss is scheduled for October 9, 2025. Because the parties believe AUSA Kipnis should take part in the Rule 26(f) conference and it would make sense for the conference to occur after the Court has issued an order on the motion to dismiss, they hereby jointly STIPULATE, AGREE, and JOINTLY REQUEST the Court to modify the scheduling order as set forth below.

| <u>Deadline</u> | <u>Current Deadline</u> | <u>Proposed New Deadline</u> |
|--|-------------------------|--|
| Federal Rule of Civil Procedure 26(f) Conference | October 3, 2025 | Three weeks following the Court's Motion to Dismiss Decision |
| Initial Disclosures Pursuant to Rule 26(a)(1) | October 17, 2025 | Five weeks following the Court's Motion to Dismiss Decision |
| Combined Joint Status Report and Discovery Plan as Required by Rule 26(f) and Local Civil Rule 26(f) | October 24, 2025 | Six weeks following the Court's Motion to Dismiss Decision |

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. *King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). For the reasons set forth above, the parties believe that there is good cause to modify the scheduling order and respectfully request that the Court grant their motion.

SO STIPULATED.

DATED this 29th day of September, 2025.

NICHOLAS W. BROWN
Attorney General of Washington

/s/ Ellen Range
ELLEN RANGE, WSBA #51334
JENNIFER K. CHUNG, WSBA #51583
LUCY WOLF, WSBA #59028
Assistant Attorneys General
CYNTHIA ALEXANDER, WSBA #46019
Deputy Solicitor General
Complex Litigation Division
Washington State Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
206-464-7744
Ellen.Range@atg.wa.gov
Jennifer.Chung@atg.wa.gov
Lucy.Wolf@atg.wa.gov
Cynthia.Alexander@atg.wa.gov

Attorneys for State of Washington

1 ROB BONTA
Attorney General of California

2 */s/ Crystal Adams*

3 CRYSTAL ADAMS*
Deputy Attorney General
4 NELI PALMA*
Senior Assistant Attorney General
5 KATHLEEN BOERGERS*
Supervising Deputy Attorney General
6 KATHERINE MILTON
Deputy Attorney General
7 1300 I Street
Sacramento, CA 95814
8 916-210-7522
Crystal.Adams@doj.ca.gov
9 Neli.Palma@doj.ca.gov
Kathleen.Boergers@doj.ca.gov
10 Katherine.Milton@doj.ca.gov

11 *Attorneys for State of California*

13 WILLIAM TONG
Attorney General of Connecticut

14 */s/ Andrew Ammirati*

15 ANDREW AMMIRATI*
Assistant Attorney General
16 165 Capitol Ave
Hartford, CT 06106
17 860-808-5090
Andrew.Ammirati@ct.gov

18 *Attorney for State of Connecticut*

21 KWAME RAOUL
Attorney General of Illinois

22 */s/ Emily Hirsch*

23 EMILY HIRSCH*
Assistant Attorney General
Office of the Illinois Attorney General
24 115 S. LaSalle St
Chicago, IL 60603
25 773-835-0148
Emily.Hirsch@ilag.gov

26 *Attorney for State of Illinois*

KATHLEEN JENNINGS
Attorney General of Delaware

/s/ Ian R. Liston

IAN R. LISTON*
Director of Impact Litigation
JENNIFER-KATE AARONSON*
VANESSA L. KASSAB*
Deputy Attorneys General
Delaware Department of Justice
820 N. French Street
Wilmington, DE 19801
302-683-8899
Vanessa.Kassab@delaware.gov
Jennifer.Aaronson@delaware.gov
Ian.Liston@delaware.gov

Attorneys for State of Delaware

ANTHONY G. BROWN
Attorney General of Maryland

/s/ Michael Drezner

MICHAEL DREZNER*
Senior Assistant Attorney General
Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
410-576-6959
Mdrezner@oag.state.md.us

Attorney for State of Maryland

AARON M. FREY
Attorney General of Maine

/s/ Sarah A. Forster

SARAH A. FORSTER*
Assistant Attorney General
Office of the Attorney General
6 State House Station
Augusta, ME 04333-0006
207-626-8800
Sarah.Forster@maine.gov

Attorney for State of Maine

PHILIP J. WEISER
Attorney General of Colorado

/s/ Sarah H. Weiss

SARAH H. WEISS*
Senior Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
1300 Broadway, 10th Floor
Denver, CO 80203
720-508-6000
Sarah.Weiss@coag.gov

Attorney for State of Colorado

ANDREA JOY CAMPBELL
Attorney General of Massachusetts

/s/ Katherine Dirks

KATHERINE DIRKS*
Chief State Trial Counsel
Yael Shavit*
Chief, Consumer Protection Division
Office of the Massachusetts Attorney General
1 Ashburton Place Boston, MA 02108
617-963-2277
Katherine.Dirks@mass.gov
Yael.Shavit@mass.gov

Counsel for Commonwealth of Massachusetts

LETITIA JAMES
Attorney General of New York

/s/ Rabia Muqaddam

RABIA MUQADDAM*
Special Counsel for Federal Initiatives
MARK LADOV*
Special Counsel
28 Liberty Street
New York, NY 10005
212-416-8240
Rabia.Muqaddam@ag.ny.gov
Mark.Ladov@ag.ny.gov

Attorneys for State of New York

RAÚL TORREZ
Attorney General of New Mexico

/s/ Aletheia V.P. Allen

ALETHEIA V.P. ALLEN*
Solicitor General
LAWRENCE M. MARCUS*
Assistant Solicitor General
New Mexico Department of Justice
201 Third St. NW, Suite 300
Albuquerque, NM 87102
505-527-2776
Aallen@nmdoj.gov
Imarcus@nmdoj.gov

Attorneys for State of New Mexico

DANA NESSEL
Attorney General of Michigan

/s/ Neil Giovanatti

NEIL GIOVANATTI*
Assistant Attorney General
Michigan Department of Attorney General
525 W. Ottawa
Lansing, MI 48909
517-335-7603
GiovanattiN@michigan.gov

Attorney for People of Michigan

AARON FORD
Attorney General of Nevada

/s/ Heidi Parry Stern

HEIDI PARRY STERN*
Solicitor General
Office of the Nevada Attorney General
1 State of Nevada Way, Suite 100
Las Vegas, NV 89119
702-486-3420
HStern@ag.nv.gov

Attorney for State of Nevada

DAN RAYFIELD
Attorney General of Oregon

/s/ Coby Howell

COBY HOWELL*
Senior Assistant Attorney General
Trial Attorney
Oregon Department of Justice
100 SW Market St.
Portland, OR 97201
971-673-1880
Coby.Howell@doj.oregon.gov

Attorney for State of Oregon

PETER F. NERONHA
Attorney General of Rhode Island

/s/ Kyla Duffy

KYLA DUFFY*
Special Assistant Attorney General
150 South Main Street
Providence, RI 02903
401-274-4400, Ext. 2809
Kduffy@riag.ri.gov

Attorney for State of Rhode Island

JOSHUA L. KAUL
Attorney General of Wisconsin

/s/ Frances Reynolds Colbert

FRANCES REYNOLDS COLBERT*
Assistant Attorney General
Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
608-266-9226
Frances.Colbert@wisdoj.gov

Attorney for State of Wisconsin

**Admitted pro hac vice*

TEAL LUTHY MILLER
Acting United States Attorney

s/ Teal Luthy Miller

TEAL LUTHY MILLER, WSBA No. 53224
BRIAN C. KIPNIS
Assistant United States Attorneys
Office of the United States Attorney
5220 United States Courthouse
700 Stewart Street
Seattle, Washington 98101-1271
Phone: 206 553 7970
E-mail: brian.kipnis@usdoj.gov
E-mail: teal.miller@usdoj.gov

Attorneys for Defendants

I certify that this memorandum contains
284 words, in compliance with the
Local Civil Rules.

ORDER

The Court GRANTS the parties' stipulated motion. Dkt. No. 177. The early case deadlines (Dkt. No. 145) are VACATED and will be reset as necessary after the Court resolves the pending motion to dismiss.

DATED this 29th day of September, 2025.

A handwritten signature in black ink, reading "Kymberly K. Evanson". The signature is written in a cursive, flowing style. Below the signature is a solid horizontal line.

Kymberly K. Evanson
United States District Judge